

I feel that it is not inconsistent to delete the 5 wpm Morse Code requirement for the Technician/ Tech Plus. I feel like that Technician classes should be given digital HF Privileges in the Novice subbands to encourage HF activity as well as promote efficient use of spectrum and SSB privileges limited to the Novice band segments . I also am in favor of keeping the 5 wpm requirement for General class licensees and current operating privileges. I would like to see the code speed for the Extra class set at 12 wpm, the Extra being the highest class of license, deserves to have more rigorous standards, just like an ATP FAA license does versus a Commercial FAA license. I would like to continue to see the Commission keep the CW subbands for those of us that do like to communicate by CW mode.

That being said, I do not feel that FCC needs to separate licensing based on mode operation. That would tend to complex the licensing structure which is contrary to Commission desires, and would cause an unreasonable burden on FCC enforcement. To delete Element 1 for people that want to work Phone, but keep Element 1 for people wanting to work CW, you would have to have multiple tests and complicate the licensing structure, i.e. if someone wanted RTTY, MT63, PSK31, and SSTV privileges you would have to have an examination test for each mode. This author strongly disagrees with this petition and calls for the the Commission to disregard this petition due to licensing and enforcement complexities.